Exhibit 20
Ohio Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Ohio – Meta Proposal

Search Terms: Meta made its most recent counterproposal on December 5, 2024 to the Ohio (i) Department of Children and Youth ("DCY"), (ii) Department of Education and Workforce ("DOE"), (iii) Department of Health ("DOH"), (iv) Department of Higher Education ("DHE"), (v) Department of Job and Family Services ("DJFS"), (vi) Department of Mental Health & Addiction Services ("DMHAS"), (vii) Department of Youth Services ("DYS"), (viii) Office of Budget and Management ("OMB"), (ix) Office of the Governor. Meta proposed a further narrowing to the Ohio Attorney General's Office on December 6. Meta's proposal involves using combinations of the search sets below

> **1.**   Search Set 1 (Social Media Terms) **w/200** Search Set 6 (Youth Terms)
>
> **2.**   Search Set 2 (Harm Terms) **w/200** Search Set 6 (Youth Terms)
>
> **3.**   Search Set 2 (Harm Terms) **w/200** Search Set 3 (Alternate Causation Terms)
>
> **4.**   Search Set 4 (Mental Health/Wellbeing Terms) **w/200** Search Set 6 (Youth Terms)
>
> **5.**   [[Search Set 1 (Social Media Terms)] **w/50** [Search Set 5 (Other Case Terms)]] **OR** [[Search Set 6 (Youth Terms)] **w/50** [(Search Set 5 (Other Case Terms)]]

Search Set 1 – Social Media Terms	
1.	("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message")

Search Set 2 – Harm Terms	
2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "adverse childhood experience" OR "adverse childhood experiences" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*) *Department of Mental Health and Addiction Services can omit the highlighted terms in String 2, but then run them separately against Search Set 6 and Search Set 3 as per the below:* *a) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 6 (Youth Terms)* *b) (wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 3 (Alternate Causation Terms)*

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	Search Set 3 – Alternate Causation Terms
5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR ("sex traff*")) *Department of Youth can omit String 5*
13.	(Covid* OR coronavirus OR pandemic OR quarantine OR "social* distanc*")
14.	(svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

	Search Set 4 – Mental Health / Wellbeing Terms
3.	("pro-ana" ((over OR excess*) w/3 diet*) OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator*)
6.	(addic* OR dopamine OR rabbithol* OR "social reward" OR "social approval" OR "screen time" OR screentime OR timespent OR "time spent" OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control")
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))

	Search Set 5 – Other Case Terms
15.	(policy OR policies OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR legislator OR advocacy OR lobby* OR suspend* OR revok* OR fine* OR sanction* OR "law enforcement" OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR omit* OR downplay* OR suppress* OR "cover up" OR "Consumer Protection Act" OR "consumer protection")

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Search Set 6 – Youth Terms	
16.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

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Custodians: Meta proposes that the above search terms be run on each agency's custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012 to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the "Relevant Time[]" in Plaintiffs' Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a "Relevant Time[]" that starts "no later than 2012").

Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Except for custodians designated with an asterisk (*), the custodians below have been affirmatively proposed by Ohio during the course of the Parties' negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian
DCY	Jodi Norton
DCY	Nicole Sillaman
DCY	Kara Wente* (Director; former Director of Children's Initiatives at the Governor's Office)
DCY	Jeff Van Deusen* (Assistant Director)
DCY	Lily Clossman* (Children's Initiatives Project Manager; former Children's Initiatives Associate at the Governor's Office)
DCY	Laura Graf* (Deputy Director, Policy)
DOE	Jessica Horowitz-Moore
DOE	Lacey Snoke
DOE	Jennifer Stump
DOH	Erica Wilson
DOH	Amadou Diallo
DOH	Ronda Merriman

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Agency	Custodian
DOH	Jennifer Voit
DOH	Sara Haig
DOH	Fern Miele
DOH	Travis Van Ness
DOH	Megan Smith
DHE	Mike Duffey
DHE	Jim Bennett
DHE	Jeff Robinson
DHE	Tom Sudkamp
DHE	Cheri Rice
DHE	Becky Stewart
DHE	Michelle Chavanne
DHE	Jana Fornario
DHE	Charles See
DHE	Kerry Soller
DHE	Carlos Bing
DJFS	Brandi Laser Seskes
DJFS	Aisha Boykin
DMHAS	Jennifer Bondurant
DMHAS	Jennifer Jarrell
DMHAS	Valerie Alloy
DMHAS	LeeAnne Cornyn* (Director; former Deputy Chief of Staff at the Governor's Office)

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Agency	Custodian
DYS	Ryan Smith
DYS	Andrew Janning
DYS	Jordan Argus
DYS	Gretchen Lapp
DYS	Chris Freeman
DYS	Corey Shrieve
DYS	Leah Garber
DYS	Anna Garver
DYS	Gary Grove
DYS	Aaron Mulvey
DYS	Benita Neeley
DYS	Ginine Trim
DYS	Yolonda Frierson
DYS	Ida Lewis
DYS	Kim Kent
DYS	Leslie Piatt
DYS	Anthony Panzino
DYS	Tereasa Moorman Jamison
DYS	Sarah Book
DYS	Ryan Gies
DYS	Julie Walburn
DYS	Tony Gottschlich

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Agency	Custodian
DYS	Jill Craig
OBM	Melissa Snyder
OBM	Maya Sattler
OBM	Matthew Sladek
OBM	Adam D'Amin
OBM	K'Yalei Harris
OBM	Michaela Perkins
OBM	Tara Clayton
Governor's Office	Scott Partika
Governor's Office	Marjorie Yano
Governor's Office	Giles Allen* (Director of Legislative Affairs)
Governor's Office	Christine Morrison* (Chief of Staff)
Governor's Office	Ann O'Donnell* (Chief Advisor to the Governor)

Ohio Counter Proposal 12-6-24

SEARCHES

1. <u>Youth Use of Social Media</u>: Search Set 1 (Social Media Terms) **w/15** Search Set 6 (Youth Terms)

2. <u>Youth Harm</u>: Search Set 2 (Harm Terms) **w/15** Search Set 6 (Youth Terms)

3. <u>Alternate Causation</u>: Search Set 2 (Harm Terms) **w/15** Search Set 3 (Alternate Causation Terms)

4. <u>Youth Mental Health/Wellbeing</u>: Search Set 4 (Mental Health/Wellbeing Terms) **w/15** Search Set 6 (Youth Terms)

5. <u>Other Case Issues</u>: [[Search Set 1 (Social Media Terms)] **w/15** [Search Set 5 (Other Case Terms)]] **OR** [[Search Set 6 (Youth Terms)] **w/15** [(Search Set 5 (Other Case Terms)]]

	Search Set 1 – Social Media Terms
1.	("social media" OR "social network" OR Meta OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message")

	Search Set 2 – Harm Terms

2.	(wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "adverse childhood experience" OR "adverse childhood experiences" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
	
	 Department of Mental Health and Addiction Services can omit the highlighted terms in String 2, but then run them separately against Search Set 6 and Search Set 3 as per the below:
	
	     a) **(wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 6 (Youth Terms)**
	     b) **(wellness OR wellbeing OR well-being OR mental health OR treatment*) /25 Search Set 3 (Alternate Causation Terms)**

	Search Set 3 – Alternate Causation Terms
5.	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR ("sex traff*"))

	Department of Youth can omit String 5.
13.	(Covid* OR coronavirus OR pandemic OR quarantine OR "social* distanc*")
14.	(svap* OR "ecig" OR "e-cig" OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

Search Set 4 – Mental Health / Wellbeing Terms	
3.	("pro-ana" ((over OR excess*) w3 diet*) OR anorexi* OR bulimi* OR orthorexi* OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)
4.	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator*)
6.	(addic* OR dopamine OR rabbithol* OR "social reward" OR "social approval" OR "screen time" OR screentime OR timespent OR "time spent" OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control")
7.	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8.	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9.	(negative w/3 (appearance OR experience OR affect* OR effect*))
10.	(compar* w/5 (appearance OR social OR other* OR negative))
11.	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12.	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))

Search Set 5 – Other Case Terms	
15.	(policy OR policies OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR legislator OR advocacy OR lobby* OR suspend* OR revok* OR fine* OR sanction* OR "law enforcement" OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR omit* OR downplay* OR suppress* OR "cover up" OR "Consumer Protection Act" OR "consumer protection")

Search Set 6 – Youth Terms	

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16.	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

Ohio Governor Proposed Search Terms – 12-5-24

Parental Notification by Social Media Operators" OR "1349.09" OR "House Bill 33" OR "33

Parental Notification by Social Media Operators' OR '1349.09'

Ohio Agency Custodians

Ohio Department of Childen and Youth

Jodi Norton, DCY's Communications Deputy and Nicole Sillaman, the head of the Children's Trust Fund

Ohio Department of Development

Benjamin Lagrasso, Records Officer

Ohio Department of Education & Workforce

Jessica Horowitz-Moore, Chief, Student and Academic Supports; Lacey Snoke, Chief Communications Office; and Jennifer Stump, Chief, Policy and Legislative Affairs.

Ohio Department of Health

Erica Wilson, Chief Policy Officer; Amadou Diallo, Chief Fiscal Officer; Ronda Merriman, Senior Financial Analyst; Jennifer Voit, Chief, Bureau of Health Improvement and Wellness; Sara Haig, Section Administrator, Women and Family Health Services; Fern Miele, Content Director; Travis Van Ness, Communications Program Administrator; Megan Smith, Public Information Officer.

Ohio Department of Higher Education

Chancellor Duffey; Jim Bennett; Jeff Robinson; Tom Sudkamp; Cheri Rice; Becky Stewart; Michelle Chavanne; Jana Fornario; Charles See; Kerry Soller; Carlos Bing.

Ohio Department of Job and Family Services

Joseph Rezes, Network Services Manager.

Ohio Department of Mental Health & Addiction Services

Jennifer Jarrell, Chief Communications Director; Valerie Alloy, Chief, Bureau of Grants Administration; Jennifer Bondurant, Acting Deputy Director, Legal and Regulatory Services.

Ohio Department of Youth Services

(Current) Ryan Smith; Andrew Janning; Jordan Argus; Gretchen Lapp; Chris Freeman; Corey Shrieve; Leah Garber; Anna Garver; Gary Grove; Aaron Mulvey; Benita Neeley; and (Former) Ginine Trim, former Deputy Director of the Division of Professional Standards and Chief Inspector (currently, Assistant Director); Yolonda Frierson, former Bureau Chief of Professional Standards (currently, Chair of the Release Authority); Ida Lewis, former agency Policy Administrator (currently, Board Member of the Release Authority); Kim Kent; Leslie Piatt; Anthony Panzino; Tereasa Moorman Jamison; Sarah Book; Ryan Gies; Julie Walburn; Tony Gottschlich; Jill Craig.

Ohio Office of Budget Management

Melissa Snyder, Department of Higher Education Budget Analyst; Maya Sattler, Department of Health and Department of Children and Youth Budget Analyst; Matthew Sladek, Department of Youth Services Budget Analyst; Adam Damin, Department of Education and Workforce Budget Analyst; K/Yalei Harris, Department of Job and Family Services and Department of Education and Workforce Budget Analyst; Mikaela Perkins, Department of Mental Health and Addiction Services Budget Analyst; and Tara Clayton, Ohio Office of Budget Management Analyst.

Ohio Governor

Marjorie Yano, Assistant Policy Director, Education; Scott Partika, Policy Director